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**From:** Cirian, Mike [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=98D0FD2CBB3F4F25B819C6929E18D08D-CIRIAN, MIKE]  
**Sent:** 4/12/2018 10:39:28 PM  
**To:** Skipper, Sherry [Skipper.Sherry@epa.gov]  
**CC:** Berry, David [Berry.David@epa.gov]; Sanchez, Brian [sanchez.brian@epa.gov]  
**Subject:** RE: CFAC SAP comments

Hello Sherry,

Thanks for the follow-up.

Mike

Mike Cirian, PE  
Libby On-site Project Manager  
US EPA  
108 East 9th Street  
Libby, MT 59923  
(406) 293-6194 Office

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**From:** Skipper, Sherry  
**Sent:** Thursday, April 12, 2018 4:18 PM  
**To:** Cirian, Mike <Cirian.Mike@epa.gov>  
**Cc:** Berry, David <Berry.David@epa.gov>; Sanchez, Brian <sanchez.brian@epa.gov>  
**Subject:** FW: CFAC SAP comments

Mike,

Here are Brian's comments. After reading David and Brian's comments and talking briefly with David about the additional comments he will be providing regarding the DQOs, I have nothing further to add.

Thanks,  
Sherry

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**From:** Sanchez, Brian  
**Sent:** Thursday, April 12, 2018 12:30 PM  
**To:** Skipper, Sherry <Skipper.Sherry@epa.gov>  
**Subject:** CFAC SAP comments

Hi Sherry,

I just have a few things to call out on the CFAC SAP. I think CDM Smith and David Berry covered it pretty well.

Send along your comments when you get a chance and I can send them to Mike Cirian. Or feel free to forward these and your comments directly to Mike. That is fine with me.

Section 4.1, last sentence of 2nd paragraph: "...WP and BERA WP, the sampling design proposed for the Phase II Site Characterization includes a minimum of 8 to 10 observations (and most of the time more than 10) for each matrix

evaluated in the exposure analysis.” What are considered as the 8-10 “observations”? Is this 8-10 analytical values for each compound for each matrix at each site? 8-10 samples per exposure unit? Some clarification here would help.

Table 5: Total TAL Metals are included here, but not Dissolved TAL Metals. The inclusion of dissolved metals is referred to in Table 1 and in the text. Suggest including it in Table 5 as well.

Table 10: I don’t believe that we will use groundwater data to evaluate ecological risk. This table may not be necessary.

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